OSBORN LAW P.C.

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September 12, 2023

The extension request is GRANTED. The proposed schedule is adopted.

Willis

SO ORDERED.

ennifer E. Willis

United States Magistrate Judge

September 15, 2023

VIA ECF

Honorable Jennifer E. Willis United States District Court Southern District of New York 40 Foley Square New York, NY 10007

Re:

Wynter v. Commissioner of Social Security Civil Action No. 1:23-cv-04712-ER-JW

Dear Judge Willis,

We write on behalf of plaintiff, Dawn Wynter, and with the consent of the defendant, to request an extension of time to serve plaintiff's motion for judgment on the pleadings per the Court's August 9, 2023 Scheduling Order. Plaintiff's motion is due on September 15, 2023. This is the parties' first request for an extension. The reason for this request is that Plaintiff's counsel currently has ten Social Security briefs, oral argument, and a religious holiday within the next ten days.

After conferring with the defendant, the parties have agreed to proceed according to the following amended scheduling order, subject to the Court's approval:

- a. Plaintiff to file her motion for judgment on the pleadings on or before **January 5, 2024**;
- b. Defendant to file its response/cross-motion on or before March 5, 2024; and
- c. Plaintiff to file her reply (if any) on or before March 19, 2024.

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn
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cc: Avni Dinesh Gandhi, Esq. (by ECF)